

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PATRICIA COSGROVE,)
)
Plaintiff,)
)
)
v.)
)
)
NEW SEABURY RESOURCES)
MANAGEMENT, INC.,)
)
Defendant.)
)

**Civil Action No.
1:05-cv-10791-GAO**

PLAINTIFF'S LOCAL RULE 26.1(B)(1) SWORN STATEMENT

Plaintiff Patricia Cosgrove submits this sworn statement pursuant to Local Rule 26.1(B)(1). Plaintiff attests that the following information is true and accurate to the best of her present information, knowledge, and/or belief, and reserves the right to amend and/or supplement the information provided here as discovery proceeds.

(a) ITEMIZATION OF ECONOMIC LOSS

The following calculations represent Plaintiff's current estimate of her damages. Plaintiff reserves the right to amend or alter these calculations as additional facts are adduced through discovery and as additional back pay and attorneys' fees accrue.

Back pay ¹ (2003-2005)	Est. \$30,000
Front pay (2005-2007)	Est. \$50,000
Health care costs (past and future)	Est. \$25,000

¹Back pay and front pay figures are calculated as the difference between plaintiff's wages as a Sales Manager at New Seabury Resources Management, Inc. and her wages at subsequent jobs.

Emotional Distress	\$100,000
Punitive damages	\$200,000
Total (excluding attorneys' fees)	\$405,000

(b) **INDIVIDUALS WHO ARE LIKELY TO HAVE DISCOVERABLE INFORMATION**

The following individuals currently work or have in the past worked at New Seabury Resources Management, Inc. and may have information regarding Plaintiff's work in the office, treatment that men and women, and specifically pregnant women, have received in the office, and promotional decisions:

Stephen Brennan
 Aaron Brochu
 Amy Buckley
 Roy Chase
 Tanya Copestick
 Allison Counsil
 Kathy Griffin
 Jane Henry
 Wayne Kapral
 Kathy Laverdiere
 Michelle O'Brien
 Lee O'Shea
 Jennifer Perry
 Rhonda (Hewitt) Rodgers
 Lauralee Taddeo

(c) **REPRESENTATIVES OF DEFENDANT FROM WHOM PLAINTIFF HAS OBTAINED STATEMENTS REGARDING SUBJECT MATTER OF THE CLAIM**

None

(d) **GOVERNMENTAL AGENCIES OR OFFICIALS KNOWN TO HAVE INVESTIGATED THE OCCURRENCE**

None

The above is true and correct to the best of Plaintiff's knowledge. Signed and sworn to under the pains and penalties of perjury this 8th day of November, 2005.

s/Patricia Cosgrove
Plaintiff Patricia Cosgrove